

UNITED STATES DEPARTMENT OF JUSTICE
WASHINGTON, D.C. 20530

Form OBD-68
(Rev 10-14-76)
Formerly DJ-307
for

AMENDMENT TO REGISTRATION STATEMENT

Pursuant to the Foreign Agents
Registration Act of 1938, as amended.

OMB
No. 43-R226
Approval Expires Oct. 31, 1981

RECEIVED
CRIMINAL DIVISION

OCT 17 4 17 PM '79

INTERNAL SECURITY
SECTION
REGISTRATION UNIT

| | |
|--|---------------------------------|
| 1. Name of Registrant ARNOLD & PORTER | 2. Registration No. 1750 |
|--|---------------------------------|

3. This amendment is filed to accomplish the following indicated purpose or purposes:

- ☐ To correct a deficiency in
- ☐ Initial Statement
- ☐ Supplemental Statement for _____
- ☐ To give notice of change in an exhibit previously filed.
- ☒ To give a 10-day notice of a change in information as required by Section 2(b) of the Act.
- ☐ Other purpose (specify) _____

4. If this amendment requires the filing of a document or documents, please list -

Exhibits A and B

5. Each item checked above must be explained below in full detail together with, where appropriate, specific reference to and identity of the item in the registration statement to which it pertains. If more space is needed, full size insert sheets may be used.

This amendment to Registrant's registration statement is to give notice of a new foreign principal of the Registrant, the British American Arts Association, and to file the necessary Exhibits A and B.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this amendment and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief.

(Both copies of this amendment shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

Brooksley E. Landau
Brooksley E. Landau
Partner

Subscribed and sworn to before me at Washington, D.C.

this 16th day of October, 1979

Saturnia E. Mc Elroy
(Notary or other officer)

My commission expires January 31, 1983
My Commission Expires January 31, 1983

DOJ

EXHIBIT A

TO REGISTRATION STATEMENT

RECEIVED
CRIMINAL DIVISION

OCT 17 4 30 PM '79

Under the Foreign Agents Registration Act of 1938, as amended
INTERNAL SECURITY
SECTION
REGISTRATION UNIT

Furnish this exhibit for EACH foreign principal listed in an initial statement
and for EACH additional foreign principal acquired subsequently.

| | | |
|---|---|---------------------------------|
| 1. Name and address of registrant ARNOLD & PORTER | 1229 Nineteenth Street, N.W. Washington, D. C. 20036 | 2. Registration No. 1750 |
| 3. Name of foreign principal British American Arts Association | 4. Principal address of foreign principal 43 Earlham Street London WC2 9LD, England | |

5. Indicate whether your foreign principal is one of the following type:

☐ Foreign government

☐ Foreign political party

☒ Foreign or ☐ domestic organization: If either, check one of the following:

☐ Partnership

☐ Committee

☐ Corporation

☐ Voluntary group

☒ Association

☐ Other (specify) _____

☐ Individual - State his nationality _____

6. If the foreign principal is a foreign government, state:

a) Branch or agency represented by the registrant.

N.A.

b) Name and title of official with whom registrant deals.

7. If the foreign principal is a foreign political party, state:

a) Principal address

N.A.

b) Name and title of official with whom the registrant deals.

c) Principal aim

8. If the foreign principal is not a foreign government or a foreign political party,

a) State the nature of the business or activity of this foreign principal

To promote artistic exchanges, tours and visits between the
United States and the United Kingdom.

b) Is this foreign principal

Owned by a foreign government, foreign political party, or other foreign principal Yes ☐ No ☒

Directed by a foreign government, foreign political party, or other foreign principal Yes ☐ No ☒

Controlled by a foreign government, foreign political party, or other foreign principal Yes ☐ No ☒

Financed by a foreign government, foreign political party, or other foreign principal Yes ☐ No ☒

Subsidized in whole by a foreign government, foreign political party, or other foreign principal Yes ☐ No ☒

Subsidized in part by a foreign government, foreign political party, or other foreign principal Yes ☐ No ☒

9. Explain fully all items answered "Yes" in Item 8(b). (If additional space is needed, a full insert page may be used.)

N.A.

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

The Association is a nonprofit unincorporated association organized and operated for exclusively charitable purposes. It is controlled by an 18-person Steering Committee consisting of persons active in the arts.

| | | |
|---------------------------------------|--|---|
| Date of Exhibit A October 16, 1979 | Name and Title Brooksley E. Landau, Partner | Signature <i>Brooksley E. Landau</i> |
|---------------------------------------|--|---|

UNITED STATES DEPARTMENT OF JUSTICE
Washington, D.C. 20530

EXHIBIT B

TO REGISTRATION STATEMENT
Under the Foreign Agents Registration Act
of 1938, as amended

RECEIVED
CRIMINAL DIVISION
OCT 11 4 10 PM '79
INTERNAL SECURITY
SECTION
REGISTRATION UNIT

INSTRUCTIONS: A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements; or, where no contract exists, a full statement of all the circumstances, by reason of which the registrant is acting as an agent of a foreign principal. This form shall be filed in duplicate for each foreign principal named in the registration statement and must be signed by or on behalf of the registrant.

| Name of Registrant | Name of Foreign Principal |
|--------------------|-----------------------------------|
| ARNOLD & PORTER | British American Arts Association |

Check Appropriate Boxes:

- ☐ The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach two copies of the contract to this exhibit.
- ☒ There is no formal written contract between the registrant and foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach two copies of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
- ☐ The agreement or understanding between the registrant and foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and the expenses, if any, to be received.

4. Describe fully the nature and method of performance of the above indicated agreement or understanding.

The Registrant has been retained to render advice on U.S. laws and policy affecting or relating to the activities of the foreign principal.

The Registrant will charge no fee for its services, although it will charge periodically for its out-of-pocket expenses. (See attached letter dated October 8, 1979.) The duration of the agreement is indefinite.

5. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

The Registrant will render advice on U.S. laws and policy affecting or relating to the activities of the foreign principal.

6. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act?^{1/} Yes ☒ No ☐

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

The Registrant's activities may on occasion include communications on behalf of the foreign principal with Executive Branch officials and with members of the U.S. Senate and House of Representatives and their staffs concerning legislation and policy affecting or relating to the activities of the foreign principal.

| Date of Exhibit B | Name and Title | Signature |
|-------------------|---------------------------------|----------------------------|
| October 16, 1979 | Brooksley E. Landau, Partner | <i>Brooksley E. Landau</i> |

^{1/} Political activity as defined in Section 1(o) of the Act means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

ARNOLD & PORTER

1229 NINETEENTH STREET, N. W.
WASHINGTON, D. C. 20036

TELEPHONE: (202) 872-8700

CABLE: "ARFOPO"

TELEX: 89-2733

Hamish R. Sandison

RECEIVED
CRIMINAL DIVISION

OCT 17 4 18 PM '79

INTERNAL SECURITY
Directorate (202) 872-8006
REGISTRATION UNIT

October 8, 1979

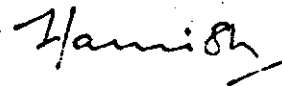
Ms. Jennifer Williams
Director
British American Arts Association
43 Earlham Street
London WC2 9LD
ENGLAND

Re: Charges to British American Arts Association

Dear Jennifer:

As you know, any time spent by me, by Dick Hubbard, and by other nonlegal personnel on behalf of the B.A.A.A. is free of charge. However, it is the policy of the firm to charge pro bono clients for all out-of-pocket expenses, e.g., telephone, mail, xerox, travel, etc. I shall of course try to keep these expenses to a minimum. You will receive a bill from time to time.

Yours sincerely,



Hamish R. Sandison